



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

March 27, 2020

**VIA ECF**

The Honorable Mary Kay Vyskocil  
United States District Court  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. Navarro, et al.*, 20 Cr. 160**

Dear Judge Vyskocil:

The Government writes in response to the Court's March 26, 2020 Order directing the parties to confer and the Government to file a letter regarding scheduling for an arraignment and initial conference and exclusion of time under the Speedy Trial Act. The Government proposed to defense counsel dates and times for an initial conference and requested that defense counsel contact the Government by noon on March 27, 2020 with any conflicts. As of the time of this filing, no attorneys have indicated a conflict with the Government's proposals. Accordingly, the Government respectfully submits the following dates and times for an arraignment and initial conference:

April 2 at 2:30 PM  
April 3 at 2 PM  
April 3 at 3 PM

The Government further requests that time be excluded from today's date up to the date of the initial conference, and that the "ends of justice served by the granting of such continuance outweigh the best interests of the public and the defendant in a speedy trial." 18 U.S.C. § 3161(h)(7)(A); *see also* § 3161(h)(7)(B)(ii) ("The factors, among others, which a judge shall consider in determining whether to grant a continuance . . . [include] [w]hether the case is so unusual or so complex, due to the number of defendants, the nature of the prosecution, or the existence of novel questions of fact or law, that it is unreasonable to expect adequate preparation for pretrial proceedings or for the trial itself within the time limits established by this section.").

[Continued]

Exclusion of time will facilitate discussions regarding the production and review of discovery, and is further warranted for the reasons set forth in the Court's order of March 22, 2020, and the District Court's Standing Order M-10-468, 20 Misc. 154. The Government has consulted with defense counsel, who do not object to the exclusion of time.

Respectfully submitted,

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United States Attorney

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Cc: All counsel (via ECF)